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October 13, 2015

Via Email

Ann Bailey, Director  
ENERGY STAR® Product Labeling  
U.S. Environmental Protection Agency  
ENERGY STAR Appliance Program  
Most Efficient@energystar.gov

Re: ENERGY STAR Proposed Recognition Criteria for Most Efficient 2016 Refrigerator-Freezers

Dear Ms. Bailey:

Thank you for the opportunity to submit comments on EPA's proposed recognition criteria for ENERGY STAR Most Efficient 2016 refrigerator-freezers.

As a very active member of the Association of Home Appliance Manufacturers (AHAM), Whirlpool Corporation has worked closely with them in the development of the comments they submitted (under separate cover). **Please be advised that we strongly support and echo the positions taken by AHAM.** This of course is in addition to the significant concerns we have with the "Most Efficient" ENERGY STAR Program in general, which have been well documented throughout the various sets of written comments we have submitted to EPA since the program first began in 2011. Whether it is the flawed cleaning criteria for dishwashers, the inconsistencies with the ENERGY STAR Program Guiding Principles, or the many other issues we have communicated, all still remain and have not been addressed in a way that would be mutually beneficial for all stakeholders. That is why we are not participating in the marketing of the program at this time.

As always, there is an open invitation to discuss in greater detail if ENERGY STAR Most Efficient is interested. Either way, as we have said many times before, our ongoing commitment to the growth, success and integrity of the ENERGY STAR promise will continue to be a strong source of pride for our company.

Thank you again for your consideration and please be sure to contact me with any follow up questions or comments.

Respectfully,

A handwritten signature in dark ink, appearing to read "Nick Gillespie", written in a cursive style.

Nick Gillespie  
Senior Manager, Regulatory Affairs